

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:22-cv-00422-JRG-RSP

JURY TRIAL DEMANDED

**HEADWATER’S UNOPPOSED MOTION TO EXTEND BRIEFING DEADLINE
ON DEFENDANTS’ MOTION TO COMPEL COMPLIANCE (DKT. 419)**

Plaintiff Headwater Research, LLC submits this unopposed motion to extend its deadline to respond to Defendants’ Motion to Compel Headwater’s Compliance with Sanctions Order Striking Copying Allegations (Dkt. 419, the “Motion”) by four days. Defendants filed the Motion on September 30, 2024. Headwater’s response is due on October 14, 2024. *See* Local CV-7(e). Headwater seeks a modest four-day extension to its deadline to respond to the Motion, which would move the response deadline from October 14, 2024 to October 18, 2024.

Good cause exists to modify Headwater’s response deadline because counsel for Headwater have various conflicts, including an ongoing trial in the Central District of California. Defendants do not oppose this request. The requested extension is not sought for the purpose of delay and will not require extension of any other deadlines.

Dated: October 10, 2024

Respectfully submitted,

/s/ Reza Mirzaie

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***Attorneys for Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 10th day of October 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Jason Wietholter
Jason Wietholter

CERTIFICATE OF CONFERENCE OF COUNSEL

I hereby certify that counsel of record for Headwater and Samsung have met and conferred in compliance with Local CV-7(h). Samsung does not oppose this motion.

/s/ Jason Wietholter
Jason Wietholter